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ABSTRACT

Four activities of the Document Design Project (DDP) in its first year of operation are described in this report. The activities described are: (1) dissemination of information about the project: (2) creation of information services, including a library of more than 450 items: (3) development of a three-day course on document simplification, which was attended by people from 15 federal agencies: and (4) development of 16 technical assistance projects designed to build the capacity of federal agency staff members to design clear, comprehensible documents. A large portion of the report is devoted to descriptions of the scope and status of each of these projects. Appendixes present letters of appreciation from three federal agencies, a reprint of a "Higher Education Daily" article on a study of the complexity levels of basic grant applications, a list of conferences attended by DDP staff members, and a list of participants in DDP workshops. (GT)

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DOCUMENT DESIGN PROJECT

Technical Assistance from the Document Design Project:

Report at the End of Year One

Prepared for the National Institute of Education, Washington, D.C.
under contract No. NIE-400-78-0043

CS205846

August 31, 1979

AMERICAN INSTITUTES FOR RESEARCH / 1055 Thomas Jefferson Street, NW, Washington, DC 20007
with CARNEGIE-MELLON UNIVERSITY
and SIEGEL & GALE

TECHNICAL ASSISTANCE FROM THE DOCUMENT DESIGN PROJECT

Report at the End of Year One

One of the tasks of the Document Design Project is to provide information services and technical assistance. This includes disseminating information about the project, serving as a source of knowledge about research and practice in document design, developing training and training materials, and providing direct assistance to writers and designers trying to improve public documents.

At the end of its first year of operation, the Document Design Project had:

- distributed over 600 brochures describing the project;
- built up a library of over 450 items;
- developed a three day course in *Simplifying Documents* that was taken by 42 people from 15 Federal agencies; and
- conducted 13 direct assistance projects with nine Federal agencies.

In the following sections we give details of each of these four activities.

A. *Dissemination*

In November 1978 we mailed a brochure describing the Document Design Project to approximately 300 people. The original mailing list was compiled from suggestions made by project staff, Federal agency people concerned with regulatory reform, and contacts that Veda Charrow had made while arranging Plain English workshops during the previous year. Interest in the project has grown steadily. Inquiries have come from as far afield as Australia, Israel, India, and Saudi Arabia.

The Document Design Project's mailing list now totals approximately 400 names. It represents academicians in English,

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Psychology, Linguistics, Instructional Technology, Market Research, and Law as well as writers, designers, and managers in government agencies and private industry.

In addition, several hundred brochures have been distributed at meetings and conferences. A complete list of the professional meetings that Document Design Project staff attended this year is appended to this report.

The Document Design Project has also received radio publicity on four occasions. Lee Gregg and Erwin Steinberg of Carnegie-Mellon University were interviewed on radio station *WFFM* in Pittsburgh. Ramsay Selden of NIE was on All Things Considered on *WETA*, the National Public Radio station in March. Blanca Rosa Rodriguez spoke about the project in Spanish on *WPFW* in June, and Veda Charrow was interviewed on *WAMU*. The Washington radio appearances were all joint publicity about the work of the Document Design Project and of the new public interest group, Plain Talk.

Articles about the Document Design Project have appeared in:

- *Federal Design Matters*, January 1979;
- *English for Specific Purposes*, January 1979;
- *Reading TODAY*;
- *Higher Education Daily*, (article about the work DDP did on the Basic Educational Opportunity Grant application), May 16, 1979.

The Document Design Project will be featured in an article, written by Ann Kurzius of NIE's Office of Public Affairs. It will appear in the October issue of *American Education*, a publication of the U.S. Office of Education.

Word of mouth has also been an excellent dissemination mechanism. Most of our inquiries about possible technical assistance come from people in Federal agencies who have heard about DDP from colleagues in other agencies.

B. *Information Services*

The Document Design Project maintains a growing library of books, journals, research papers and newspaper articles on topics relating to language simplification, cognitive psychology, psycholinguistics, reading research and instructional technology. Books and journals are catalogued as part of the AIR library system but are housed with the rest of the DDP collection in the Document Design Center. All of the material (including reprints, technical reports and other unpublished papers) is also catalogued on index cards by DDP support staff.

The literature file now contains approximately 450 items and is growing at a rate of about 30 items per month. The library has been used by graduate students from area universities as well as by staff of Federal agencies. The most common topic of interest is readability, readability formulas, their advantages and their limitations, and alternatives to readability formulas as a standard for plain language. Inquiries for this information have come from government writers, state legislators, and congressional committee staff.

In addition, the Document Design Project has begun to serve as a center of information about what others are doing in researching topics that relate to document design. Inquiries about our work and what we know of others have come from researchers in various universities and particularly from the military groups working in the same area.

The Document Design Project will also be able to take advantage of the material collected during the summer of 1979 by the Document Design Center's first summer intern. Rebecca Pressman, a second year law student at Catholic University Law School, studied the status of state requirements for readable insurance policies.

As part of this Document Design Center project, Ms. Pressman compiled a complete file of plain language bills introduced in state legislatures and of insurance commissioners' regulations on readability of policies. We have shared information with that gathered by the newly formed public interest group, Plain Talk. To our knowledge, the Document Design Center and Plain Talk now have the only complete, publicly available, collections of state laws, bills, proposed and enacted insurance regulations on plain language.

C. *Workshops*

Training is an important component of each technical assistance project. DDP staff have given several two-hour workshops to clients as part of the work on specific TA projects. Each of these mini-workshops has focused on a particular document or type of document.

In meetings with prospective clients from several agencies early in the year, it became clear that there is a widespread need for training in the process of document design. Most of the people who write regulations and who design forms in Federal agencies are not trained as writers.

DDP staff, therefore, developed a three-day course in "Simplifying Documents." The course follows the DDP model of document design with modules on:

- the process
- audience
- purpose
- context and constraints
- organization
- language
- review and editing
- graphics
- evaluation

Each module includes objectives, an outline of the content of the session, and exercises. The modules on organization, language and graphics include specific guidelines for writers and designers to follow. The examples in the exercises all come from legal documents, regulations, brochures or forms from Federal agencies. The modules are put together as a manual in a loose-leaf binder. A unique feature of the manual is a background paper on the research basis for the guidelines.

The course was over-subscribed both times that we offered it. We accepted 24 people for the March session and 20 for the workshop in June. To allow several agencies to send participants, we limited the number of people who could attend from any one group.

Participants' evaluation of the course were generally very favorable. After the first presentation of the course, participants requested that more time be spent on the language guidelines and rewriting exercises. They found the early modules (audience, purpose) and the last modules (graphics, evaluation) less useful.

Without dropping these modules completely, we did reorganize the workshop between March and June. We combined the sessions on audience and purpose, gave three sessions on language instead of the original two, and completely reoriented the module on graphics. Evaluations of the second presentation of the course indicated that participants were pleased with the amount of time spent on rewriting exercises. The other modules were also more interesting to the participants.

In a follow-up study of participants in the March workshop two months after the training, 17 of 21 respondents said they were using the information from the workshop regularly. Nineteen said the guidelines on writing were particularly helpful. Nine had passed the manual on to others in their office. Three people were writing guidelines for their agencies based on the information in the Document Design Project's workshop manual.

D. *Direct Assistance to Clients*

Working with Federal agency writers on specific documents has been the major focus of the Document Design Project's technical assistance component. Early in the project, we established procedures for setting up technical assistance projects. These include procedures for:

- initial meetings,
- decisions to proceed with the project,
- how to set up and maintain a file for the project, and
- requirements for reporting progress and results of each technical assistance project.

We established a policy of requiring a letter of understanding from the client so that DDP and the agency would have, in writing, a mutually-agreed upon description of the technical assistance project.

Clients in the Document Design Project's first year were:

- the Office of Regulations in the Department of Housing and Urban Development (HUD),
- the Bureau of Drugs in the Food and Drug Administration (FDA),
- the Bureau of Student Financial Assistance in the Office of Education (BSFA),

- the Social Security Administration (SSA),
- the Internal Revenue Service (IRS),
- the Division of Food and Nutrition Services in the Department of Agriculture (FNS), and
- the Interagency Council on Citizen Participation led by the Federal Communications Commission and the Federal Trade Commission (ICCP).

Projects with the Federal Communications Commission (FCC) and the Postal Service are being planned.

The chart on the next two pages is an overview of the sixteen technical assistance projects that were assigned file numbers during the past year. The projects have dealt with a variety of public documents including:

- regulations,
- application forms and instructions,
- income tax forms and instructions,
- an income tax publication,
- an information brochure for food stamp recipients,
- notices that taxpayers get if they make arithmetic errors on their forms,
- information leaflets for prescription drugs.

In each project our goal has been primarily to build the capacity of the agency staff to design clear, comprehensible documents. A related goal has been to raise the concern and ability of the agency to evaluate changes that it makes in documents. A third goal has been to help produce clearer and more comprehensible documents for public use.

In selecting projects and agencies to work with, we have followed a set of priorities which gives preference to documents that affect large numbers of citizens, that are of critical importance to those citizens, that affect most deeply those people who have the fewest resources to seek help in

The Document Design Project's Technical Assistance Clients for the year 1978–79

TA#	AGENCY	CONTACT	PROJECT	STATUS	DDP CONTACT PERSON
001	HUD	Wm. Granik Office of Regulations	Rewriting Privacy Act Regulations	Draft completed, being typed	Redish
002	FDA	S. Moore Bureau of Drugs	Analyzing 4 PPIs for Valium	Completed; report available	Redish
003	FDA	S. Moore Bureau of Drugs	Staff training in document design skills	Completed; workshop held 1/3/79	Redish
004	IRS	Ruth Hill Taxpayer Services	Analysis of notices	Completed; review meeting with IRS held 6/7/79	Redish
005	OE/Bureau of Student Financial Assistance	S. Jenks, G. Blair Basic Grants	Financial aid forms — analysis of current documents	Analysis complete; report available from OE; maintaining active file to review revisions from Bureau	Redish Breaznell
006	SSA	J. MacDonald Office of Regulations	Evaluation of rewritten regulations (also linguistic analysis)	Internal report written, workshop held; evaluation is planned but not yet scheduled	Felker (Redish)
007	IRS	R. Linger G. Shear Tax Forms and Publications Division	1) Seminar to 150–175 tax law specialists	Seminar held 2/22/79	Charrow Redish
			2) Rewriting instructions	Completed; project included revision of 1040 A, Schedule E, Schedules R & RP, 1040, Form 4684	Charrow
008	Dept. of Agriculture	B. Snyder Office of Public Information	Writing a new information brochure about Food Stamps	Draft complete, evaluation under discussion	Olkes
009	FCC	J. Johnson Radio Broadcast Services	Evaluation of Marine Radio Regulations	Several planning meetings held; this is the most promising evaluation project	Felker

DDP Technical Assistance Clients (Continued)

TA#	AGENCY	CONTACT	PROJECT	STATUS	DDP CONTACT PERSON
010	FCC	E. Jones	Analysis of audience for booklet on use of privately purchased telephones	Dropped	Felker
011	FCC	Belle O'Brien FCC Consumer Ass't Office	Seminar for GS 15 reviewers of regulations	Postponed	Redish
012	FCC	Belle O'Brien	Review of booklet on broadcasting rights and obligations written to inform interested consumers	Terminated with memo on suggestions (2 sessions held; agency uninterested in evaluation of this document)	Olkes
013	FCC FTC	Belle O'Brien Bonnie Naradzay	Seminars on Federal agencies communicating with Hispanics	Conferences held 5/17/79 and 8/9/79; very well attended	Rodriguez
014	IRS	G. Shear Tax Forms and Publications Division	Rewriting publications	Completed; revised publication 590, IRA's	Olkes
015	IRS	M. Alexander Taxpayer Services	Field test of draft 1979 forms	Completed; Felker and Rose advised IRS on preparations for field test, each spent one week in the field monitoring the tests, analyzed returns, wrote report to IRS	Felker Rose
016	Postal Service	a) R. Jeffrey Consumer Services Div.	Design and evaluation of Customer Service Card	Planning	Felker
		b) M. Boudreau Forms and Publications	Revision and evaluation of International Mail publication	Planning	Charrow

dealing with documents. Thus our work on tax forms, food stamps information, federal aid to needy students, and labeling of prescription drugs as well as work with the interagency council on the issue of communications with Hispanic-Americans are all high priority projects.

An ideal technical assistance project would include:

- analyzing the old document and explaining the analysis to the agency writers;
- training the agency writers in the process of document design;
- serving as a catalyst for change and reviewing drafts of the new document; and
- serving as an advocate of evaluation and advising on the evaluation.

Because of special circumstances, some projects have included only parts of this process. On the following pages, we describe briefly the scope and status of each project.

#001 *Office of Regulations, Department of Housing and Urban Development.* In this project, DDP has been working with an HUD lawyer, William Granik, who is rewriting the HUD Privacy Act Regulations (24 CFR 16). These regulations were selected by the agency to be used as an example of how regulations can be written in clear English and still be legally accurate. The general public might need to read the Privacy Act Regulations but the current document is poorly organized, written in very long sentences, and makes innumerable references to documents the public is unlikely to have available.

Mr. Granik has completed a handwritten draft. The rewritten regulation is more clearly organized, speaks directly to the user, avoids referencing other documents, and is written in short, understandable sentences. In the process of rewriting, Mr. Granik found legal inconsistencies and inaccuracies which he corrected.

The project has taken much longer than intended however, because it is not a priority for the agency. The draft is not yet typed. The agency has committed itself to evaluating the new document but no plans are yet underway. The delays in this project indicate the potential problems in redrafting a regulation for the sake of putting it in plain English when that is not a priority activity for the agency. Future DDP projects in rewriting regulations should involve regulations that *must* be promulgated by a certain date.

#002 and #003 *Bureau of Drugs, Food and Drug Administration.* The Prescription Drug Labeling Staff is responsible for making rules about the language and design of information that must accompany prescription drugs. The Document Design Project's work with this group has not followed the technical assistance model because the group is not primarily document designers. They, like the DDP, are involved in research on document design.

The documents they are concerned with used to be called "patient package inserts" (PPIs). In the regulations currently under consideration, the documents are called "patient labeling." In January 1979, at the agency's request, DDP analyzed four versions of a PPI for Valium that had been created by agency staff for use in a research project using focused-group interview techniques. The report of this analysis, *Differences in the Language and Design of Four PPIs for Valium,* is available both from the Document Design Project and from the National Technical Information Service (NTIS).

DDP also gave a mini-workshop for the group and two members of the group attended DDP's three day course. Alan Siegel was an invited speaker at the group's December conference on PPIs which other members of the Document Design Project also attended. Ginny Redish was asked to serve as a reviewer of the patient package insert for estrogens that the Rand Corporation created for a research project funded by the FDA group. Dr. Redish will also testify at a September hearing on

the proposed regulations for patient labeling.

#004, #007, #014, and #015 *Internal Revenue Service.* The Document Design Project has established a client relationship with several groups in the IRS.

Training: In February, Ginny Redish and Veda Charrow presented a seminar to IRS tax law specialists and writer/editors on techniques of clear writing. Examples of both good and poor organization, writing, and format were all taken from tax forms and instructions. In addition, two IRS writer/editors attended each of the sessions of the DDP course in *Simplifying Documents*.

Revising Forms and Instructions: From February to June, Veda Charrow met one afternoon per week with a small group working on instructions for specific forms. They revised:

- the instructions for Form 1040A,
- Schedule E and its instructions,
- the instructions for Schedules R and RP,
- the instructions for Form 1040,
- the instructions for Schedules A and B,
- Form 4684 and its instructions.

Revising Publications: From May through August, Cheryl Olkes worked with the Publications Branch revising Pub. 590 on Individual Retirement Arrangements.

Evaluating Tax Forms and Instructions: Dan Felker and Andy Rose assisted IRS in planning and conducting an evaluation of selected draft 1979 tax materials including the forms and instructions that Veda Charrow had helped to revise. They accompanied the IRS to field sites to assist in the data collection, and then analyzed errors and comments from the 254 taxpayers whose data were useable. An 18 page report containing analyses and observations was submitted to the IRS on

27 July. Very high error rates (30-60%) were reported for some lines in certain tax situations. The IRS will use these results in further revisions of the tax forms and instructions.

Reviewing Notices: In the Spring, DDP also responded to a request from IRS to review a new type of notice that is being sent to taxpayers who have made errors on their forms. The new notices are printed on high speed computers. The old notices were preprinted and then filled in by computer.

DDP staff met with representatives of the four IRS branches who are involved: Taxpayer Services, Returns Processing, Tax Forms and Publications, and Service and Design. We were able to make several suggestions for better language and layout. Although we were not called in until after this test had been started, the notices being tested are only the first of many that must be changed if the IRS is going to use high speed computer technology. DDP also suggested evaluation techniques that might give more useful results in future tests.

#005 *Bureau of Student Financial Assistance.* This was one of the most successful of the DDP's TA projects in Year One. Approximately 3.3 million students use the Basic Educational Opportunity Grant form (BEOG) or the College Scholarship Service's Financial Assistance Form (FAF); but both forms are so difficult to complete that between 34 and 45 percent of the applications cannot be processed because of incompleteness, inconsistency or inaccuracy.

The major effort in this TA project was the analysis of the current forms and instructions. In a 41 page report with 43 pages of appendices, Ginny Redish discussed the language and organization of the BEOG and the FAF. Ann Breaznell and other Siegel & Gale designers contributed an analysis of the typography and layout of the forms and instructions. This report, *The Complexity of Financial Aid Applications*, is being distributed by OE.

The Document Design Project's work on these forms was praised in a letter of appreciation from Leo Kornfeld, Deputy Commissioner for Student Financial Assistance, and publicized in an article in *Higher Education Daily* in May 1979. Both are reprinted in the appendix to this paper.

The Document Design Project maintains a client relationship with BSFA. Staff members from the group attended the DDP workshop. The group calls on DDP regularly for review of draft revisions. The 1980-81 form and instructions for both the BEOG and FAF incorporate most of the suggestions DDP made in the report. The differences between the current and revised forms are dramatic. Time constraints (including the OMB clearance requirement) have precluded field testing of any of the many changes that have been made in these forms. Evaluation will have to wait until the forms are in use and the processor begins to report error data.

#006 *Social Security Administration.* This project was to cover only the evaluation of selected regulations that SSA has rewritten. As a first step in that evaluation, SSA requested that DDP review two rewritten regulations. Ginny Redish analyzed the material using the techniques that she had developed in the report for the Food and Drug Administration. She also gave a two-hour workshop in April at SSA for the senior staff of the Office of Regulations in *How to Analyze a Regulation.* The purpose was to show senior reviewers in the agency what to look for in a clear and simple regulation. She used the two regulations as examples.

Since April, DDP has given SSA plans for an evaluation of the regulations and there have been several telephone conversations about the project. There has been considerable reorganization and several changes of personnel in the SSA Office of Regulations this year. The agency has not yet moved ahead with a commitment to the evaluation. Therefore, DDP considers this project officially active, but will not take further

action until SSA renews the contact and demonstrates that they are willing to support an evaluation.

#008 *Department of Agriculture, Food and Nutrition Service.* This is an example of a project in which we are following the entire document design process from conception through evaluation. The project is to design a new brochure, Publication 1123, *The Food Stamp Program.* Cheryl Olkes has included training sessions and critique/review sessions in her meetings with the team. A draft of the publication is now ready. However, the copy must pass through the multi-level clearance process before it will be released. Changes in staff and in the regulations that the brochure is interpreting have delayed the production and the field-test. The writer thinks they will be able to test the brochure this fall. The agency is committed to evaluating this document.

#009 *Federal Communications Commission.* The FCC regulation on Citizens Band Radios is the primary example of a regulation reorganized and rewritten so an audience of the general public (CBers) could read and understand it. Those regulations were never evaluated with a comprehension test. (A two-item attitude questionnaire was included in the Federal Register when the regulation was proposed.)

The FCC has, since then, rewritten the regulations for recreational boat radios. This is an excellent regulation to evaluate because the audience is readily identifiable, easily located, and includes people with a wide range of reading ability.

FCC approached DDP for help in evaluating the regulations for recreational boaters. FCC has obtained necessary clearances from FCC offices. They had expected to start the evaluation during the summer but the staff person who initiated the project transferred to another agency. The evaluation is now planned for October and November.

#013 *Interagency Council on Citizen Participation.* The Interagency Council on Citizen Participation (ICCP) is an organization open to federal and non-federal employees interested in furthering the goals of consumer and public participation in Federal agency activities. In April the ICCP asked DDP to help organize a steering committee of federal employees and community members to plan a series of presentations on the issue of Hispanic participation in Federal programs. From the steering committee efforts developed the Hispanic Outreach Program, now an integral part of ICCP. The objective of the ICCP Hispanic Outreach Program is to create a greater awareness of the existing needs of the Hispanic Community and to identify ways in which Federal agencies can more effectively reach this community. Blanca Rosa Rodriguez of the Document Design Project has been the facilitator for this group.

Members of the steering committee include:

Jose Carlos Gomez
National Economic Development Association

Jose M. Paz
National Economic Development Association

Rosamelia Toledo
Food and Drug Administration

Belle B. O'Brien
Federal Communications Commission

Marietta Moore
National Credit Union

David L. Duarte
HEW/FDA

Henrietta Villascusa
HEW/PHS/NSA/BCHS

Nancy Rubin
USDA/AMS

Hector Villafare
EDA/USDOC

Maria Elena Toruno
Community Services Administration

Andres Ortez
U.S. Office of Bilingual Education

Ray Urquechart
State Department

Bonnie Naradzay
Federal Trade Commission

With the assistance of the ICCP, especially Belle B. O'Brien, President of the ICCP and Bonnie Naradzay, ICCP Program Coordinator, the Hispanic Outreach Committee planned two major sessions. The first meeting consisted of a series of presentations addressing general problems of Hispanic involvement and responses to federal programs. The second meeting provided an opportunity for participants to exchange ideas and share experiences on how to reach the Hispanic community and also to present to the audience a series of Hispanic outreach efforts by some federal agencies.

The program for the May meeting was:

Congressman Robert Garcia. (D) New York: *An Overview of the Hispanic Community and the 1980 Census.*

Richard Hernandez. Deputy Assistant to the President: *The Administration and the Hispanic Community.*

Joaquin Blaya. Vice-President, Spanish International Network: *Effective Communication with Hispanics.*

Raul Yzaguirre. President, National Council of La Raza: *Hispanic and Citizen Participation.*

In August, the ICCP Hispanic Outreach Program focused on identifying positive and effective ways for designing, developing, and implementing future Hispanic outreach efforts by federal agencies. Panel members were:

Alexander Grant. Special Assistant to the Commissioner for Consumer Affairs/Food and Drug Administration.

Jorge Lezcano. President, Latin Consumer Federation.

Elisa Sanchez. Immediate Past President, Mexican American Women's National Association.

Phillip Garcia. Department of Housing and Urban Development.

Rosamelia Toledo. Food and Drug Administration.

The meeting, held at the Federal Trade Commission, attracted representatives from over 34 agencies.

#016 *The Postal Service.* Two groups at the Postal Service have recently approached DDP about technical assistance projects. The Consumer Services Division wants help in designing and evaluating a customer services card. This card is available in a table top display at every post office. Customers use it to report problems with postal services.

The Forms and Publications Division is revising its Publication 42 - *International Mail*, and needs help and advice in revising and evaluating this material. They have a March, 1980 deadline for a new publication.

Publication 42 consists of nine chapters of procedural information and two appendices with 1) tables of postal rates to various countries and 2) other information pertaining to mail to those countries. The publication is used by post office workers and mailroom people in large and small businesses. The Postal Service has received many complaints about the publication from its users, and is taking them into account in its revision.

DDP is considering both of these as possible TA projects. The Postal Service affects all Americans. Although these documents may not be critical to everyone, they are important examples of information from the Post Office. The customer service card is the public's vehicle for redress from the Postal Service. Helping to make it understandable to a wide audience would be a useful task. Studying the user's ability to work with the tables in the *International Mail* publication (before and after revision) would be an interesting research project. DDP is meeting with these two Postal Service groups again in September.

APPENDIX

Letters of appreciation

- Food and Drug Administration
- Office of Education
- Internal Revenue Service

Article from *Higher Education Daily*

List of Conferences Attended by DDP Staff

List of Participants Who Attended the Workshops in March and June, 1979

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION
ROCKVILLE, MARYLAND 20857
HFD-107

JAN - 8 1979

Dr. Ginny Redish
Document Design Project
American Institute for Research
1055 Thomas Jefferson Street, NW
Washington, DC 20007

Dear Ginny:

Thank you for the workshop session which you took time to present to the Prescription Drug Labeling Staff. Although time did not allow us to do a great deal, the group was very positive about the brief exposure.

As both of your programs develop, I hope that other sessions to compliment the Wednesday session will be possible. If it can be arranged, I would like to have one or two of the PPI staff members attend the general workshop in March.

Please call us if we can be of any help to you.

Sincerely yours,

Lloyd

Lloyd G. Millstein, Ph.D.
Acting Director, Prescription
Drug Labeling Staff
Bureau of Drugs

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF EDUCATION
BUREAU OF STUDENT FINANCIAL ASSISTANCE
WASHINGTON, D.C. 20202

MAY 14 1979

Dr. Janice C. Redish
Document Design Project
American Institutes for Research
1055 Thomas Jefferson Street, N.W.
Washington, D.C. 20009

Dear Dr. Redish:

I would like to take this opportunity to thank you, the Document Design Project, and Siegel and Gale for the outstanding work you have done on the applications for student financial aid.

I would like to compliment you on the thorough job done in your study, The Complexity of Financial Aid Applications. I have found your report very enlightening. It calls attention to the many problems with current student aid forms and provides examples of how the forms can be improved. The report has been well-received, and we look forward to distributing it to the financial aid community.

Your report has acted as a catalyst in our movement toward a simplified form. Your thorough assessment of the Basic Grant Form and the Financial Aid Form affectively argues that simplification is necessary and not an option.

I would like to thank you for your enthusiastic assistance as we have developed the new "common form." The result of this hard work is truly satisfying — the millions of students who apply for Basic Grants in 1980-81 will fill out an easier, better form.

Please accept my sincere thanks for a job well done.

Sincerely,

Leo L. Kornfeld
Deputy Commissioner,
Student Financial Assistance

Internal Revenue Service

Department of the Treasury

Washington, DC 20224

Person to Contact:

Telephone Number:

Refer Reply to:

Date:

Dr. Janice C. Redish, Director
Document Design Project
American Institutes for Research
1055 Thomas Jefferson St., N.W.
Washington, D.C. 20007

Dear Dr. Redish:

Thanks very much for your assessment and comments regarding our CP-11 and CP-23 High Speed Non-impact Printer (HSNIP) notices.

We also appreciate your taking time to meet with IRS representatives on June 7. Your comments and those of Dan Felker will be given serious consideration in our efforts to simplify and improve our communications with the public.

We are also looking forward to Dan's assistance in the design and, to some extent, in the conduct of our test of Forms 1040 and 1040A for 1979.

Sincerely,

Walter M. Alt
Acting Director
Taxpayer Service Division

BASIC GRANT APPLICATIONS NEED TO BE SIMPLIFIED, SAYS AIR STUDY

Filling out either the U.S. Office of Education's Basic Grant (BEOG) application or the College Scholarship Service's aid form is "very difficult," but the CSS form is "far more complex than the BEOG," a new study concludes.

Students unfamiliar with forms requiring tax-related information have their hands full with either form, said the American Institutes for Research (AIR), a private research firm. The bureaucratic language and confusing designs of the forms "contribute to inaccuracy," which means "eligible students do not get aid they are entitled to and ineligible students may be getting more than they should."

"Difficult instructions lead to incompleteness and inaccuracy which in turn lead to rejection," said the AIR study of the complexity of the two most popular forms used by students applying for BEOG awards.

Rejected Applicants The study, prepared for OE by Janice Redish, a linguist and AIR's director of the document design project, was prompted by the large number of BEOG applications being rejected because of the form's complexity.

OE data show about 40 percent of BEOG applicants were rejected last year and 33 percent of this year's applicants have been turned down (HED, May 3).

Many students "lose out on aid that they are entitled to, only because they cannot fill out the form accurately, completely, and legibly," the study said. "Something is obviously wrong."

The study said both forms are geared toward people who file tax returns, although many applicants do not. Students who do not file tax returns "will have great difficulty with these forms," said AIR, adding that applicants who fill out the forms before they do their tax returns must find it hard to complete them accurately.

Problems With CSS Form AIR said the CSS form uses confusing instructions, difficult language and a "more forbidding" type size and layout that add up to a "more complex form" than BEOG. Information on releasing CSS information for the BEOG program is "at the end and easily missed," and the CSS form lacks information about BEOG on the front and does not indicate there is information on the back of the form, AIR said.

AIR recommends CSS reconsider the necessity of each item, simplify and clarify the information and instructions, redesign the form so it is "less cluttered," consider using only one financial statement column for students or their parents and "consider having separate columns or reworking the instructions to meet the special needs of people who do not file income tax returns."

The study concludes money and time would be saved by all parties and students would experience less frustration if the forms and instructions were simpler and clearer.

CSS Is Listening Carol Halstead, director of the College Board's public information office, said CSS is proposing a "drastic simplification" of its form that takes into account the AIR study recommendations. But both Halstead and Lawrence Gladieux, director of the College Board's Washington, D.C., office, said the form cannot be completed until it is determined what data elements OE will require on the BEOG form.

OE is giving financial aid officials until May 31 to suggest changes in the BEOG form for the 1980-81 academic year. (more)

BASIC GRANT APPLICATIONS NEED TO BE SIMPLIFIED, SAYS AIR STUDY (Cont.)

Gladieux called the AIR study the "first systematic look" at the financial aid forms "from a linguistic point of view and readability."

CSS, an arm of the College Board, provides need analysis services for students applying for financial aid.

The CSS form has a clearer set of purposes because it begins by explaining what it is and what it will require of students, according to the study. But every section of the CSS form contains unnecessary questions for BEOG applicants and using CSS "as a BEOG-only application is probably a very confusing and frustrating experience," the study said.

A Guide Leo Kornfeld, HEW's deputy commissioner for student financial assistance, said OE has used the AIR study as a guide in developing a simpler form for the 1980-81 academic year.

Indeed, the AIR study said OE's proposed form reflects many of its suggestions and is "much simpler, clearer and easier to understand."

About 2.2 million students used the CSS form to apply for BEOG awards in the 1978-79 academic year and 1.3 million used OE's BEOG form, according to AIR. Students also applied for grants through the American College Testing Service and the Pennsylvania Higher Education Assistance Agency form, but they accounted for "relatively small numbers of BEOG applicants," the study said.

Copies of the study, The Complexity of Financial Aid Applications, will be available free from the Bureau of Student Financial Assistance, HEW, Room 4318, ROB 3, 400 Maryland Ave., SW., Washington, D.C. 20202.

Conferences Attended by DDP Staff

October 1978 - September 1979

When/Where	What	Who	Why
October, 1978 Washington, D.C.	American Dialect Society Conf./ Georgetown NWAVE Conference	Charrow	Presented paper, "Legal Language: What Is It and What Can We Do About It?"
November 2-3, 1978 Washington, D.C.	NIE Conference on Literacy in the Community	Redish	Open discussion - no formal papers
December, 1978 Washington, D.C.	FDA Conference on Patient Package Inserts	Siegel	Invited paper on "Wonder Drugs in Wonderland"
		Krug, Charrow & Redish	Each attended one session of conferenc
December 18-19, 1978 Washington, D.C.	Institute of Medicine, National Academy of Science Committee on Patient Package Inserts	Krug	Attended meetings as a member of the Committee (also in February and March, 1979)
December, 1978 Boston, Mass.	Linguistic Society of America Annual Meeting	Charrow	Presented paper "A Final Report on Jury Instruction Comprehension"
January, 1979 Chicago, Il.	American Association of Law Schools	Charrow	Presented paper, "Why Clear Legal Drafting Should Be Taught in Law Schools"
January 26, 1979	Illinois Supreme Court, Pattern Jury Instruction Committee	Charrow	Gave a talk with Robert Charrow on writing comprehensible jury instructions; distributed DDP brochures

When/Where	What	Who	Why
February 9, 1979	Federal Credit Legislation Subcommittee of the Committee on Commerce, Banking & Finance of the Young Lawyers' Section, ABA	Charrow	Attended meeting as member of the Subcommittee
March 1-2, 1979 San Francisco; March 11-12, 1979 New York, N.Y.	Practising Law Institute Workshop on Drafting Documents in Plain Language	Redish	Presented papers, "How to Draft More Understandable Legal Documents"; "Readability"
		Siegel	Presented "Drafting Simplified Legal Documents: Basic Principles and their Applications"
March 14, 1979 Princeton, N.J.	Educational Testing Service, Seminar on "Functional Language of Bilingual Children"	Rodriguez	Seminar participant
March 15, 1979 Pittsburgh, PA	Conference on English Education and Secondary School English	Steinberg Young	Presented papers: Steinberg - "English Teachers for Business, Industry and Gov." Young - "Performance Objectives: Goals for a Writing Course"
March 16-17, 1979 Pittsburgh, PA	Conference on English Education	Flower Gregg Hayes	Flower - writing workshop for teachers: Flower, Gregg, & Hayes - participated in symposium "Research on Cognition and Written Language"
March 22-24, 1979 Washington, D.C.	Georgetown Roundtable on Language and Linguistics	Charrow	Presented "Characteristics of the Language of Jury Instructions" (with Robert Charrow)

When/Where	What	Who	Why
March 22-24, 1979 Washington, D.C.	Georgetown Roundtable on Language and Linguistics	Redish	Invited chair of special interest session on "Plain English in Public Documents"
March 27, 1979 Washington, D.C.	Interagency Consumer Committee	Rodriguez	Attended as member of panel to explore problems of Spanish-speaking consumers
April 2-7, 1979 Seattle, Wash.	National Association of Colleges and Universities in Bilingual Education	Rodriguez	Chaired Executive Board session; presented paper "Social Functions on Language: Bilingual Children"
April 4, 1979 Minneapolis, Mn.	Conference on College Composition and Communication	Flower Hayes	Presented joint paper "Cognition of Discovery: Defining a Rhetorical Problem"; Flower chair, Hayes member of panel on cognitive process approaches to writing
		Young	Presented paper "Thinking, Writing, and the Limits of Memory"
April 8-12, 1979 San Francisco	American Educational Research Association	Hayes Flower	Presented joint papers, "Writing with the Reader in Mind", "Process-based Evaluation: Changing the Performer, not the Product"; participated in symposium "Recen Approaches to Writing Research"; Haye presented paper and commented on sessio on writing as problem solving

When/Where	What	Who	Why
April 18, 1979 Princeton, N.J.	Educational Testing Service seminar on "Ethnographic Analysis of Face-to-Face Interactions"	Rodriguez	Participated in seminar
April 27, 1979 Indiana, PA	Indiana Univ. of Pennsylvania - Workshop for Community College & Four-Year College English Teachers	Young	Participated in series of papers and workshops on problem analysis and formulation in tagmemic rhetoric
April 28, 1979 New York, N.Y.	American Society of Writers on Legal Subjects, Institute on the Teaching of Legal Writing	Redish	Participated in panel on "New Approaches and Techniques in the Teaching of Legal Writing"
May 7-10, 1979 Blois, France	International Federation of Information Processing Societies Conference	Hayes	Presented workshop, "Methodology of Interaction", and paper, "Cognition and Man-Machine Interaction"
May 7-11 1979 Loire, France	SEILLAC conference on "Cognitive Processes in Design"	Hayes	Participated in invited conference
May 7, 1979 Philadelphia, PA	Eastern Communication Association Annual Convention	Young	Chaired panel, "Rhetorical Invention and Communication Pedogogy"
May 8, 1979 Ottawa, Ontario	Canadian Council of Teachers of English	Young	Presented paper, "Arts, Crafts, Gifts, and Knacks: Some Disharmonies in the New Rhetoric"
June 18, 1979 Detroit, Mich.	University of Detroit seminar, "Current Theories of Composition"	Young	Presented paper, "Rhetorical Situation and Rhetorical Strategies"
June 27-30, 1979 Rhode Island	Chairmen of English Departments	Young	Led seminar, "Composition: Programs and Training"

When/Where	What	Who	Why
August 7, 1979 Ann Arbor, Mich.	Univ. of Michigan Conference on Teaching Technical and Professional Comm.	Young	Presented paper, "Designing Objectives for Technical Writing Courses"
August 13 & 17, 1979 Washington, D.C.	Coalition of Hispanic Community Agencies, Latino Affairs Office	Rodriguez	Met to discuss the Spanish Language Clause in the proposed D.C. Plain Language Bill
August 16-17, 1979 Ann Arbor, Mich.	Univ. of Michigan Engineering Summer Conference on Written Communications for Engineers, Scientists, and Tech. Writers	Young	Presented paper, "Order and Disorder Beyond the Sentence"
September 1-5, 1979 New York, N.Y.	Society for the Psychological Study of Social Issues/ American Psychological Assoc. annual meeting	Krug, Felker, Rose, Charrow	Presented 2-hour program "Simplifying Documents: Policy, Research and Practice"
	Council of Grad. Dept. Heads/APA	Gregg	Discussed CMU's new Grad. program
	APA conference	Hayes	Discussant in symposium, "Teaching Psychology and Teaching Writing"
September 15, 1979 Kean College Union, N.J.	New Jersey Committee for the Humanities Conference - "Language as Barrier: The Contracts & Documents of Daily Living"	Charrow	Will present paper, "Linguistic Aspects of Legal Language"
Sept. 29-Oct. 6, 1979 Northampton, MA	Smith College Seminar on developments in writing	Flower, Young	Will participate in seminar

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